

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOHN DEATHERAGE,)	Case No. 3:16-CV-0206 MMD-VPC
)	
Plaintiff,)	STIPULATION TO EXTEND TIME
)	FOR EXPERT WITNESS
Vs.)	DISCLOSURES
)	
SCHINDLER ELEVATOR)	
CORPORATION, ABC)	
CORPORATIONS 1-10, and)	
JOHN DOES 1-10,)	
)	
Defendants.)	

Pursuant to Local Rule 26-4, the parties request an extension of two (2) weeks to make expert disclosures.

(a) Statement specifying the discovery completed:

The parties have exchanged initial disclosures, paper discovery and conducted depositions of the parties.

(b) A specific description of the discovery that remains to be completed:

Defendant Schindler has indicated its desire to take the depositions of several non-party witnesses. Those depositions are in the process of being scheduled.

(c) The reason why the deadline was not satisfied or the remaining discovery was not completed within the time limits set by the discovery plan:

Four (4) depositions of employees of Defendant Schindler Elevator Corporation were taken on August 5, 2016, at Sunshine Court Reporting in Reno, NV. These depositions involved the elevator mechanics who serviced and were responsible for maintaining the subject elevator prior to the malfunction.

To date, Plaintiff has not received the transcripts of the proceedings. Sunshine Court Reporting has indicated that it has been unable to contact the court reporter who transcribed the depositions and that she is currently undergoing chemotherapy treatment for breast cancer. Sunshine has assured Plaintiff the transcripts will be available early next week. Should the Court require, Sunshine Court Reporting has offered to provide a certification reflecting the above facts.

Based on the lack of transcripts, Plaintiff has not been able to provide its experts with critical testimony regarding the servicing and maintenance of the subject elevator prior to its malfunction and Plaintiff's experts have not been able to finalize their reports.

(d) A proposed schedule for completing discovery:

The parties have stipulated to a two week extension to the expert disclosure deadline – moving the deadline to September 9, 2016.

Dated: August 26, 2016

By: /s/ Timothy Dinan

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED:  September 4, 2016